

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

SHANNON FERENCZ, Administratrix of the)
Estate of Cade Stevens and SHANNON)
FERENCZ, Individually,)

Plaintiffs,)

VS.)

LARRY MEDLOCK, WARDEN OF THE)
FAYETTE COUNTY JAIL,)

et. al.,)

Defendants)

CHIEF MAGISTRATE JUDGE
LISA P. LENIHAN.

No. 2011-cv-1130-LPL

TYPE OF PLEADING:

PETITION FOR LEAVE
FOR PLAINTIFFS TO FILE
RESPONSE BRIEF TO
DEFENDANT'S REPLY.

**PETITION FOR LEAVE TO FILE RESPONSE TO DEFENDANT FAYETTE COUNTY AND LOU
KRAKOWSKA'S REPLY.**

AND NOW COME the Plaintiffs, by their lawyer, Noah Geary, and respectfully submit as follows:

1. On February 2, 2012, the Defendants filed a Reply Memorandum of Law to the Plaintiffs' Brief in Opposition to their Rule 12 Motion to Dismiss or in the alternative, Motion for Summary Judgment.
2. Upon review, the Plaintiffs strongly believe that a Response is necessary.
3. The Plaintiffs' proposed Response is attached hereto as Exhibit "A". It is not lengthy.

WHEREFORE, the Plaintiffs respectfully request this Honorable Court, in the interest of issues being fully decided on their merits, to grant leave to the Plaintiffs to file the attached Response to the Defendants' Reply.

Respectfully submitted,

/s/ Noah Geary, Esquire
Suite 225
Washington Trust Building
Washington, PA 15301
724-222-3788
PA ID 78382
February 10, 2012

CERTIFICATE OF SERVICE:

I, Noah Geary, Esquire hereby certify that I have served all opposing parties with a copy of the foregoing Pleading via electronic filing, this day, to their respective counsel of record.

February 14, 2012

/s/ Noah Geary, Esquire